

IPP

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INTERMOUNTAIN POWER PROJECT
ATTENTION: ENVIRONMENTAL PROTECTION AGENCY

April 14, 1983

Mr. Brent C. Bradford
Executive Secretary
Utah Air Conservation Committee
150 West North Temple
Salt Lake City, Utah 84110

Dear Mr. Bradford:

Additional Information on
Emission Control Technologies

This letter is in response to your invitation to submit information on the technology status and estimated costs of certain air emission control technologies that are recommended in the "Proposed Guidelines for the Control of Emissions From Coal-Fired Power Plants" (Guidelines) of the California Air Resources Board (CARB). Enclosure 1 of this letter is a report prepared by Stearns-Roger Engineering Corporation that gives an expert technical analysis of the Guidelines. Enclosure 2 of this letter is a report prepared by Black and Veatch Consulting Engineers, the Intermountain Power Project (IPP) Architect and Engineer, that gives the estimated costs that would result from the installation of selected catalytic reduction (SCR) NOx emission control equipment and 95-percent efficient SO₂ emission control equipment on IPP.

As you can see from Enclosure 2, the costs of imposing either SCR or 95-percent efficient SO₂ emission control equipment on IPP at this time are prohibitive. The costs that would result from project delays alone are estimated to be over one billion dollars for either technology and would necessitate reevaluation of the project's feasibility.

We should make it clear that by responding to your invitation and submitting this information, we do not concede that the Guidelines are in any way relevant to IPP. As you know, IPP is installing control devices that are consistent with, and will ensure, compliance with the emission control conditions set out in the Department of Health's (DOH's) December 3, 1980 air quality approval order for construction and operation of IPP.

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Also, since receiving the December 3, 1980 approval order, IPP has not made any changes that would result in increased air emissions or air quality impacts, nor has IPP made any change in NOx control technology. In fact, any changes that have been made at IPP will result in substantially reduced air emissions and air quality impacts. Since IPP is not seeking changes in its permitted emission limits and is not increasing emissions from the plant site, then under the Utah Air Conservation Regulations, IPP is not subject to any major modification review nor to any further control technology review.


Not only are the California Guidelines irrelevant to the construction and the operation of IPP, but also they should be inappropriate for use in other "Prevention of Significant Deterioration" (PSD) permitting situations in Utah. This is so for several reasons. First, the California Guidelines have not been adopted or approved in any way for use in Utah. The DOH has not adopted them nor has the Environmental Protection Agency (EPA) made them part of any federally imposed requirement affecting Utah. In fact, the Guidelines are not even part of California law. Although they were adopted by the CARB in 1981 (six months after the DOH issued IPP its air quality approval), the Guidelines have not been incorporated into California law; they have not been adopted by any California Air Pollution Control District or any California Air Quality Management District; and thus they are not enforceable in California or anywhere else. In any event, many of the conclusions in the California Guidelines are not generally accepted. Enclosure 1 shows that the use of SCR technology for NOx control has not been demonstrated to achieve compliance with the Guidelines. Also, the Guidelines' contention that SCR is best available control technology (BACT) for NOx emissions is highly controversial even for nonattainment areas. This technology has not been approved as BACT by EPA or any state to the best of our knowledge. Indeed, as shown in Enclosure 2, imposition of this technology on IPP would be so costly as to seriously threaten the project's economic feasibility. Additional research and development are required to determine if the benefits of SCR will ever outweigh its adverse side effects and high costs for application to power plants similar to IPP.

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If you or your staff require any additional information, please
contact Mr. Roger T. Pelote at (213) 481-3412.

Sincerely,


JAMES H. ANTHONY
Project Director
Intermountain Power Project

RTP:gp

Enclosures

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